

COMMENTS of Jay Merrell
on behalf of Industrial Dielectrics, Noblesville, IN
before the NTP Board of Scientific Counselors
February 24, 2009 – NIEHS, RTP, NC

Good afternoon. I'm Jay Merrell. I'm not a scientist, and I'm not going to talk about toxicology. But I do very much appreciate having a few minutes of your time.

I'd like to explain why it is very important for NTP and this Board to fairly review all the relevant scientific data, and carefully arrive at the most valid conclusion possible concerning the potential for styrene to cause cancer in humans.

My company, Industrial Dielectrics, was founded by my father in 1966. We have two composite plants in the US and two others around the globe. Specifically I want to tell you about our oldest plant, in Noblesville, Indiana.

Noblesville is a small town north of Indianapolis. Our plant is located near the center of town, in an area of mixed residences and commercial operations. Even though we only employ 140 people in Noblesville, we are one of the larger manufacturing employers in this community.

At Noblesville, we use styrene-polyester resin, glass fibers and other materials, to make highly engineered molding compounds, that our customers use to make products for use in electrical equipment and appliances.

People are exposed to styrene inside and outside of our plant. We comply with all the applicable OSHA and EPA regulations, and we work hard to provide a safe environment for our employees and our plant neighbors. But since styrene is easy to smell in the air at low concentrations, people are aware of it.

There are thousands of other companies like mine – small and medium-sized firms, many family owned, that use liquid styrene-polyester resins to make products such as fiberglass boats, underground gasoline storage tanks, bridge beams, components for cars and trucks, modular tub/shower units, ballistic armor, and wind turbine blades.

Including raw material suppliers, our industry employs approximately 300,000 Americans, in towns and cities all across our country.

I certainly speak for our company when I say that protecting the health of our workers and neighbors is very important. And I know enough other business owners in the industry to say with confidence that we are all committed to providing safe workplaces. I live in Noblesville, where I was born and raised. Our employees are our neighbors. In the many family owned companies, it is not unusual to find the grandchildren of the founders working on the shop floor.

So that is why it is so important that NTP and other government agencies provide the best guidance and information you can, regarding the health effects of styrene and the other chemicals we use.

I've mentioned our real commitment to safe operations, and for this we need you to warn us of potential health effects. But as a business owner, I'm also committed to providing a return on my family's investment in our company, and committed to providing jobs in our communities. So I need to rely on you not to frighten people needlessly.

If you believe there is a significant risk that my employees or plant neighbors might get cancer from styrene, then I ask that you issue a clear warning. But it would be tragic if NTP's styrene review resulted in unwarranted concern among our workers and plant neighbors. As a smaller company, we cannot effectively operate in an environment

where people are afraid of cancer.

I understand that you are conducting a hazard assessment, and that other government agencies have the responsibility of doing full risk assessments and setting exposure limits and control requirements. However, recent history provides examples of extreme public concern resulting from draft hazard assessments. In just the last year, a draft NTP report on a chemical used in plastic manufacturing was the subject of national media attention. Many people who depended on products made with Bisphenol-A, such as baby bottles, became very concerned about injury to their families. I don't personally know whether such concerns are valid for this chemical, but I do know that an entire industry making important products was destroyed.

I'm told that there are serious controversies regarding the data on styrene health effects, and that industry scientists and independent experts who have reviewed the data have come to very different conclusions from the NTP staff. I also understand that your meeting today may be the last chance for anyone to review all the data, and listen to the different points of view, and make the most valid determination. If you don't have the information or time you need to do this today, I ask that you consider telling the staff, rather than just accepting what is proposed or remaining silent.

In conclusion, please do your work carefully. My family, and our employees and plant neighbors, are depending on you to provide a health warning if needed. But only if needed.

Thank you very much.